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December 14, 2015

Hon. Brenda K. Sannes
United States District Court
Northern District of New York
James M. Hanley Federal Building
100 S. Clinton St.
Syracuse, NY 13261

**Re: United States v. Clayton Brothers
15-CR-198 (BKS)**

Dear Judge Sannes:

Please be advised that I have been retained by Clayton Brothers to represent him in the above-captioned case. I respectfully request that the Court permit me to substitute as counsel. I will be filing an electronic notice of appearance separately.

I also write to respectfully request a thirty-day extension of time to file Mr. Clayton's suppression hearing submissions so that I may have time to familiarize myself with the case. Currently, suppression hearing submissions are due December 21st, 2015, and I do not yet have any of the discovery. I note that I will be out of the country from December 19th, to December 26th, 2015. The Government consents to this request.

Respectfully,

Merchant Law Group LLP

By: _____ /s
Daniel DeMaria

cc: AUSA Douglas G.N. Collyer

Randi Juda Bianco